



Office of Emergency Management

August 12, 2019

Michael J. Wilhelm
Chief, Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 1 Street SW
Washington, DC 20554

Re: Gunnison County Wireless Emergency Alert Test—PS Docket No. 15-91.

Dear Chief Wilhelm:

This letter is to respectfully request a limited waiver of the Commission's Wireless Emergency Alert (WEA) rules to permit Participating Commercial Mobile Service (CMS) Providers to participate in a WEA test conducted by the Gunnison County Office of Emergency Management, in coordination with the Gunnison – Hinsdale Emergency Telephone Service Authority and the Gunnison Regional Communications Center (PSAP). The Gunnison County OEM is the sole Originating Authority for IPAWS in the County.

As proposed, and if approved, the test would be conducted on Thursday September 26 at 2:00 PM Mountain Time, and would be targeted to Gunnison County. With September being National Preparedness Month, we felt this would be good timing to conduct this test. The text of the test will read as follows: Gunnison County OEM: TEST emergency msg. Feed-back to eoc@gunnisoncounty.org TEST only.

The purpose of conducting the test at this time is to ensure that emergency management officials in Gunnison County have a clear understanding of how alerts would perform in our mountainous area. We cannot wait until the newly adopted FCC rules are implemented because Gunnison County hosts a large number of tourists year-round, and we are vulnerable to natural disasters. WEA is an excellent tool to reach visitors to the county, who most likely wouldn't have subscribed to our county's emergency alert system, and might be the only one that would be effective, especially in a large crowd at special events.

Prior to the test, Gunnison County OEM will coordinate with the Participating Commercial Service Providers in the area. The WEA test is not intended as a substitute for other scheduled WEA tests.

The most common threats to the public in Western Colorado are wildfires and flash floods. In the event of a wildfire, evacuations in many parts of Gunnison County would be necessary, and WEA would be a vital tool in getting the word out to as many citizens and guests as possible in a timely manner. The same is true of flash floods. Effective, efficient notification to the public is critical in these situations in order to provide them with the information they need. Additionally, we want citizens and visitors to be familiar with the format of the WEA messaging, and to become familiar with other County messaging systems. In the event of emergencies, our WEA, EAS, and other emergency messaging will direct citizens to www.gunnisoncounty.org for more information.

In advance of this test, we will conduct considerable public outreach via the Gunnison County website (www.gunnisoncounty.org) and the social media outlets of many of our user agencies throughout Gunnison County. We will also run ads in our local newspapers, the Gunnison Country Times and the Crested Butte News, as well as interviews with local radio stations. In addition to advising the public of the test, we'll include that they may receive duplicate messages. In case of bleed-over to adjacent counties, we will inform our neighboring PSAPs and Emergency Management Offices of the test as well, and they are prepared with information should their citizens have questions about the test. We will also contact the Colorado Department of Transportation, which will display information about the test on their overhead variable message signs on US Hwy 50 and Colorado Hwy 135, the primary and major routes through Gunnison County.

We intend to develop a short survey for citizens to fill out following the test, in order to capture data about location reach, cell carrier, handset operating system, and awareness in general about the test. We are happy to share the results of this survey with FEMA and the FCC.

We appreciate the opportunity to partner with the FCC and FEMA on this opportunity to test the WEA functionality in a mountainous environment. Thank you for your consideration!

Respectfully,



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